

Personnel

Policy

Version 2

NOVONOR

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1. OBJECTIVE

This Policy aims to reinforce the values of our culture, focused on the strength of persons as agents of transformation, and to guide the implementation of practices in the management of persons.

2. GLOSSARY

In order to standardize the expressions and terms used throughout this policy, the following words and abbreviations mean:

CA-NOVONOR	Board of Directors of Novonor S.A.
CCCPS-NOVONOR	Novonor S.A. Culture, Communication, Persons and Sustainability Committee
PA Cycle	Process of planning and covenant, monitoring, evaluation and judgment of the action program (PA).
Novonor Culture	Novonor's organizational culture based on the business technology developed by founder Norberto Odebrecht
Guidance Documentation	Formal documents of NOVONOR that provide content on corporate decisions, rules and guidance that are vital to direct the work in the company with legitimacy, traceability and applicability, and must be observed and practiced by a certain defined universe of Members.
DP-NOVONOR	CEO of Novonor S.A.
Ethics	A system of moral principles that guides us for the good of persons and society.
Member	People working at Novonor at all levels, including executives, officers, trainees and apprentices.
Leaders	Every member who leads a team.
Novonor	Novonor S.A., the holding company of Novonor Group.
PA	Action Program.
R-Compliance	Compliance Officer at Novonor S.A.
RAF	Functional Support Officer.
RAF-Persons, Communication and Organization	Responsible for People, Communication and Organization at Novonor S.A.

3. PROVISIONS

3.1. OUR BELIEF

At Novonor, we have our own corporate technology, called Novonor Culture, founded on a humanistic philosophy, focused on values and on the strength of persons.

These values and beliefs complement the art of business with the spirit of service, translated into the commitment to generate wealth, with ethics, integrity, and transparency, for customers, users, communities, members, shareholders, and society in general.

Our values are reflected in a set of **fundamental principles**, which constitute the cultural and ethical references practiced by our members:

- We trust in the potential of the human being and in his/her will and ability to develop, because he/she is the origin and the end of all actions in society;
- communicate with clarity, respect, and transparency, and are willing to influence and be influenced, in the pursuit of doing what is right;
- we act in synergy, through the coordinated action of human beings, in search of the potentiation of common results;
- we put creativity at the service of continuously overcoming challenges;
- we practice partnership, committing ourselves to exceeding the results agreed upon, with consequent sharing of the generated wealth;
- we achieve productivity by the permanent attitude in the practice of effectiveness, which is to look for what is right, and efficiency, which is to do well what is right;
- we believe that education through work accelerates our development, by practicing our culture and continuously overcoming challenges; and
- we reinvest the results generated, providing new job opportunities, better and greater wealth to society, and the creation of stronger and more dynamic companies.

Fundamental principles:

- Human Beings
- Communication
- Synergy
- Creativity
- Partnership
- Productivity
- Education through work
- Reinvestment

Essential Concepts:

- Decentralization
- Planned delegation
- Business task
- Result
- Social Responsibility

Learn in full the fundamental principles and essential concepts of our culture in the book **Survive, Grow, and Perpetuate**.

It is part of our culture to act with an entrepreneurial spirit in a decentralized way, based on planned delegation, reinforced by a disciplined process of follow-up, evaluation, and judgment. We encourage the constant integration and development of generations of partner entrepreneurs, that operate from Small Business, with a focus on the entrepreneurial task: continuous process of identifying, winning, and satisfying customers, with ethics, integrity, and transparency, generating material and moral wealth, serving society and fulfilling our social responsibility, with sustainability.

Throughout our trajectory, we have gone through moments of challenges and opportunities. We leverage our successes, learn from our mistakes, reposition ourselves, always focusing on the future. With each cycle, we take on new commitments, in tune with the spirit of the times. It is this spirit that allows us to progress and anticipate, in a dynamic and proactive way, the demands of the new times, without losing the connection with our values.

We believe, with conviction and determination, that practicing our culture and policies, acting ethically with integrity and transparency, and committing to promoting diversity, strengthen us and increase our competitiveness, in the direction of survival, growth, and perpetuity.

3.1.1. ETHICS, INTEGRITY AND TRANSPARENCY

Out of conviction and in line with society's expectations, we assume the public commitment to act ethically, with integrity and transparency.

At Novonor, we believe that people are agents of transformation. The discipline of our acting with ethics, integrity, and transparency generates respect and, consequently, people's trust.

Ethics makes us act in the right way always, and especially when our actions affect other people, directly or indirectly. Ethics is rational and fundamental to exploring options and making decisions, applying the right values. Acting ethically means doing what is right, even when such an attitude is not required by law. This is the environment we foster and value at Novonor.

See **Novonor's Policy on the Compliance System.**

Access the Ethics Line, a secure and confidential channel for anyone to report, without retaliation, inappropriate behavior in our environments that violates Novonor's commitment to ethics, integrity and transparency.

See the **Sustainability Policy** to learn more about our commitments.

UN - SDGS

Learn about the 17 United Nations Sustainable Development Goals on the UN website.

Integrity, expressed through attitudes and behavior, reflects the character of each individual and is a fundamental value of our culture.

By acting transparently, we act openly, honestly, and clearly, consolidating sustainable, long-term relationships. Transparency brings people together, stimulates dialogue, strengthens credibility, and encourages innovation, efficiency, and productivity processes.

3.1.2 SUSTAINABILITY

We base our actions on the belief that sustainability is inserted in everything we do, in an integral way in our lives. Acting with sustainability, for us, means performing our activities and operations in an efficient and preventive way, generating results, creating job and income opportunities, using natural resources with awareness, controlling impacts, and preventing waste. It means using cleaner technologies and controlling risks, paying attention to both the work environment and the surroundings, with the communities where we operate. It means delivering useful products and services to society that contribute to sustainable development as portrayed in our commitments and the sustainable development goals ("ODS") of the UN.

3.2 ABOUT US

At Novonor, we have common values, attitudes and behaviors that reinforce our identity. Selecting, integrating, evaluating, and promoting people, aligned with the values of our culture and the guidelines contained in the policies, lead us to a virtuous circle.

Each member needs to be aware that their way of thinking and acting serves as an example, and must be consistent with what we value. We are people aligned with the following behaviors:

Ethics, integrity, and transparency

- We act in compliance with laws, policies, and internal guidelines;
- We always do what is right;
- We do not abuse power or authority;

- We make decisions free from self-interest;
- We act openly, honestly, and clearly;
- We honor the commitments we have made;
- We respect and integrate individual differences.

Spirit of service

- We are motivated to serve, rather than to desire to be served;
- We seek to relate to each other with humility and simplicity;
- We are willing to learn, relearn, and teach;
- We share our knowledge proactively;
- We encourage and promote collaborative environments;
- We treat people without arrogance;
- We are devoid of vanity.

Determination

- We have self-discipline;
- We identify what is important and what makes a difference;
- We establish and focus on priorities;
- We finish our deliveries on time, at the agreed-upon cost and quality;
- We persisted in delivering the agreed upon goals;
- We overcame challenges and barriers.

Constructive and positive spirit

- We embrace challenges with optimism;
- We turn problems into opportunities;
- We are aggregators and consolidate relationships of trust;
- We cultivate and demonstrate good humor;
- We transmit enthusiasm and pleasure in what we do;

- We combine high performance with low ego;
- We believe in people's strengths;
- We recognize that it is possible to do better.

Creativity

- We look at the facts from different angles;
- We abstract, conceptualize, and act from reality, trends, and experiences;
- We bring solutions to what is already established and can be improved;
- We have an open mind to innovate;
- We synthesize and solve complex issues, without being superficial;
- We transform ideas into projects, which leverage productivity.

Adaptability

- We are committed to self-knowledge;
- We see the benefits of change;
- We seek new challenges;
- We adapt our approach and methods in dynamic environments;
- We keep our balance in adverse situations;
- We are open to new cultures, environments, and contexts;
- We seek to relate, internally and externally, in a collaborative and respectful way.

Ability to dialogue

- We have a commitment to influence, and a willingness to be influenced, in the pursuit of what is right;
- We listen carefully;
- We speak and write respectfully, clearly, transparently, and accurately;
- We facilitate the exchange of ideas and the search for alignment with everyone involved;

- We receive and provide frank and constructive contributions;
- We have tone of voice, posture, and gestures that create empathy;
- We focus on the solution.

Commitment

- We think and act with an owner's mentality;
- We are accountable for what we do;
- We take responsibility for our actions;
- We are serious;
- We make decisions with foundation, courage, and willingness;
- We deliver results leveraged by creativity and productivity;
- We satisfy and surprise customers by our ability to deliver, with continuous improvements;
- We see our mistakes as learning opportunities;
- We ask for feedback and develop;
- We are committed to our self-development

3.3 HOW WE MAKE IT HAPPEN

We are perceived, internally and externally, through our day-to-day actions, interactions between people, approaches to decision making, achievements, results delivered, and integration into communities.

It is the leader's fundamental role to identify, integrate, develop, evaluate, promote, and recognize people whose attitudes are consistent with our principles and values and who demonstrate the capacity to deliver tangible and intangible results. This commitment nourishes our culture on a daily basis and must be agreed upon and monitored, by the leader, by means of strategic people indicators in his/her PA. To do so, the leader, focusing on meritocracy, counts on the proactive support of the person responsible for the people on his/her team, a professional who has a contributive and impartial posture, preserves our culture, through the example and consistency of his/her attitudes, encourages the professional, personal, and economic development of persons, and acts and influences the formulation of corporate strategy.

At Novonor, discriminatory practices in identifying people are not tolerated.

3.3.1 IDENTIFICATION OF PERSONS

The continuous identification of people, aligned to the values of our culture, is fundamental to ensure our perpetuity. This is a role of the leader, which he/she cannot delegate, and requires preparation, dedication of time, and motivation.

We encourage the identification and integration of young people as interns. Throughout the identification process, the leader educator must recognize in the young people the attitudes and behaviors valued in our culture. Potential and willingness to develop in Novonor Group by and for the job are also evaluated, as well as their academic background reflected in the formal syllabus.

For leadership positions or positions that require people with experience, we focus on our people, providing new and increasing challenges. In specific situations, we look for people outside Novonor Group who have specific competencies and alignment with the values of our culture.

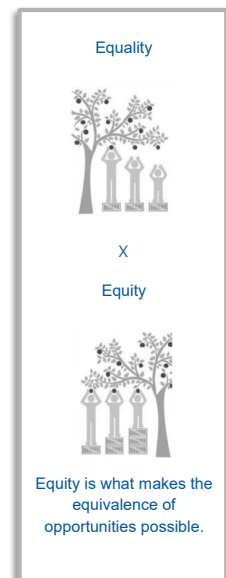
As we operate globally, in various sectors, we challenge ourselves to reinforce the leader's commitment to diversity when building his/her teams. This transformation, in line with the spirit of the times, begins, in fact, with the identification of people.

All people, regardless of sex, gender, aesthetics, sexual orientation, nationality, race, age, religion, background, culture, and/or disabilities should be treated with respect, dignity, and fairness. At Novonor, practices or attitudes that reveal discrimination are unacceptable, moral or sexual harassment, verbal embarrassment, physical violence, discrimination, and lack of freedom of expression.

The wealth of diverse perspectives and life experiences helps us see opportunities and challenges from different angles. The plurality of looks, with the precision of knowledge, enhances and multiplies our capacity to deliver.

Promote diversity

Start with identifying and integrating young people with different backgrounds, genders, races, nationalities, and cultures.



Trustworthy, the person being led receives from his/her leader the delegation to make it happen, translating his/her commitment and purpose into the covenant of a PA, in search of tangible and intangible results. This delegation is planned, demanding discipline in the covenant, monitoring, evaluation and judgment of the PA, with constant interactions.

The authentic educating leader:

His/her greatest legacy is reflected in the next generation of leaders he is committed to integrating and fostering development, transcending his/her own career cycle at Novonor.

The PA cycle:

- Planning and covenant;
- Follow-up;
- Evaluation;
- Judgment

Based on mutual trust, the person being led negotiates with his/her leader the delegation to transform what has been negotiated into reality, to achieve tangible and intangible results, translating his/her commitment and purpose into the covenant of a PA.

We seek to ensure that all our members have the same opportunities to develop and enhance their skills. To do so, it is fundamental that we recognize individual differences, eliminating or minimizing eventual barriers. We encourage each member to make a personal commitment to the diversity agenda, and on a daily basis, welcome, respect, and empower diversity in his/her work environment. We believe that diversity leverages people engagement and enhances the generation of results.

3.3.2 INTEGRATION AND DEVELOPMENT OF PERSONS

We are a company of people who integrate by knowing and practicing our culture and generating growing results, both tangible and intangible. In this process, the role of the leader is fundamental. At Novonor, the authentic leader is, above all, an educator, committed to the pedagogy of presence, offering time, experience and example constantly. He/she earns the team's respect by acting ethically, with integrity, transparency, and consistency, and by aligning his/her attitudes and behavior with the values of our culture.

At Novonor, the relationship of mutual respect and trust between leader and subordinate is fundamental to the disciplined practice of the AP cycle. Each step in this cycle represents an invitation for deep, direct, and transparent dialogue. It is the leader's duty to identify character, values, the will to serve, and the strengths of each of his/her subordinates, in order to stimulate their development. The leader does not wait until his/her subordinate is fully capable and ready for a new challenge to be offered to him. Thus, it is up to the leader to offer new opportunities to his or her subordinates, always compatible with their degree of maturity and moment of life.

On the other hand, each member must be committed to his/her own development, provoking and dialoguing with his/her leader about the challenges of his/her PA and his/her life and career purpose. This plan is built with a long-term vision and must be revisited, with wisdom and maturity, in each cycle of personal and professional achievements.

By delegating, the leader promotes and consolidates an environment of trust and autonomy in the formation of his/her team, encouraging people to excel, generating growing tangible and intangible results. The delegation, accompanied by discipline, control and follow-up, allows the leader to get to know better the potential of each member. Delegation presupposes establishing bonds of trust, offering continuous challenges, encouraging new ways of searching for solutions, contributing to the development and formation of new generations of leaders.

These are the foundations of education through work, a process of mutual learning that demands dialogue and humility from both leader and followers.

Education for work can be enhanced by initiatives that develop individual skills and specific knowledge, in other words, by education for work.

In order to be the agent of his/her own destiny, the member must invest in his/her self-knowledge and self-development. The member must reconcile and harmonize his/her dedication to his/her work with the other dimensions of his/her life, strengthening his/her integration, development, sense of accomplishment and engagement.

3.3.3 THE PRACTICE OF EVALUATION

By assessing, the leader demonstrates his/her permanent commitment to creating and consolidating a relationship of trust with his/her subordinate. It is at this moment that the leader emphasizes the strengths of his/her subordinate and makes explicit his/her needs for improvement and opportunities for growth. So that the assessment dialogue is effective, it is fundamental that the leader is willing to influence and be influenced, in the pursuit of what is right.

The assessment of the leader must happen both informally, on a daily basis and at the timely moments, and formally, at least once a year, during the PA evaluation. In the assessment, leader and led must dialogue about the practice of our culture and policies, results generated, specific knowledge, as well as about the potential and willingness to develop at Novonor. It is up to the leader to know the life and career purpose of each one and to have a dialogue about his or her next steps.

For dialogue between people to flourish, trust must be established. The subordinate must reflect in advance, through his/her self-assessment, about his/her attitude in achieving the results achieved and the opportunities for improvement. The conversation is only rewarding and relevant, if those involved believe in the legitimacy of the interaction and if both bring concrete examples. Paying attention and really listening indicates attention, respect, and interest in the other person. This way, we ensure that the practice of evaluation results in a mutual learning process.

Step-by-step evaluation:

- For the dialog to be effective, the leader and the follower must prepare themselves beforehand;
- The dialogue must be transparent and honest;
- The commitment to influence and the willingness to be influenced make the dialogue engaging and generate mutual learning;
- The result of the evaluation should generate a clear conclusion, translated into a commitment to concrete development actions;
- The result of the evaluation is shared by the leader with his direct leader.

Plan and enhance your career at Novonor:

- Be consistent: your attitudes and behavior must be aligned with the values of our culture and the guidelines contained in the policies;
- Build a consistent track record, with clear deliverables;
- Talk to your leader in a structured and transparent way;
- Use your self-knowledge in your decision making;
- Consider challenges in different areas: business, companies, projects, sectors, and even countries; programs in the line of entrepreneurship and support;
- Maintain long-lasting relationships;
- Identify and be committed to the training of your successor;
- Take a long-term view.
- We encourage the development of social security awareness in all members, from a young age.

True evaluation mobilizes and engages. Just as important as providing constructive input from the leader is the openness and willingness of the subordinate to listen, understand, positively take in the learning, and turn it into a commitment to real and concrete actions for his or her constant development.

It is also up to the leader to decide whether or not to continue with the subordinate on his or her team and at Novonor, and to personally implement his or her decision in a structured, constructive and respectful manner. By taking action, the leader avoids compromising future results and establishes himself as a true educator leader.

3.3.4 CAREER AND SUCCESSION

It is the educating leader's role to create the conditions and environment that ensure the integration and development of his or her subordinates. The greatest contribution that a leader can make is to create the conditions for his/her successor to qualify and excel naturally. It is up to the leader to evaluate the best opportunity for the development of each member of his/her team, even if this opportunity is with another leader. He/she must also awaken in each individual the awareness of his/her individual responsibility for his/her development and growth at Novonor.

Each member must be the agent of his or her own destiny. Your career is built by successive full cycles of PAs, with increasing challenges and delivery of tangible and intangible results. The member must be motivated and willing to dialogue with his/her leader and, together, identify new opportunities for development and growth, taking into consideration his/her life and career purpose.

The career of each member is a consequence of his/her individual choices. Faced with a new opportunity, it is up to him/her to decide what makes the most sense for his/her growth, considering his/her moment in life and his/her long-term vision at Novonor. More than seeking promotions and merits, one should consider learning opportunities, experiences, and the possibility to make a difference.

It is up to the Leader to define the compensation of each member of his or her team, in alignment with this Policy.

Plan and talk transparently with each of your team members about this strategic issue.

Throughout the professional trajectory, we encourage our members to have the awareness and discipline to plan their career transition to maturity. This planning should be intensified around the age of 50. In maturity, it is necessary to have vitality, emotional balance, and accumulated assets to enable a new stage of productive life, with tranquility and disposition.

3.3.5 REMUNERATION

Remuneration is an essential component of partnership at Novonor, one of the core principles of our culture. In essence, the practice of partnership occurs with the participation of each of the members in the conception and realization of his/her work, as well as in the generation and sharing of the results generated.

The references for sizing the total remuneration ("RT") of each member in Novonor are linked to his/her PA, based on: (i) responsibilities, challenges, skills, and maturity; (ii) ability to generate tangible and intangible results for the company; and (iii) market references.

The member's RT is the result, therefore, of dialogue and negotiation with his/her leader in the construction of his/her PA. RT at Novonor is composed of:

- **Monthly Withdrawal (RM):** salary or monthly fixed fees, depending on the functional link. It reflects the background, the maturity of the member, and the position he or she holds.

- **Short-term incentives (ICP):** due to conviction, we share the results achieved with the members responsible for their generation. This conviction stems from the principles and concepts of our culture, in particular, commitment to the personal and professional development of the member and the certainty that this practice stimulates innovation and increases productivity. The dialogue between leader and subordinate for negotiation, definition and evaluation of the ICP is one of the noblest moments in the practice of our culture, because of the mutual commitment it requires, regarding the future of both and the company.

The ICP represents the variable portion of the member's RT, such as PLR and complementary fees, whose calculation reflects a maximum period of 12 months. The ICP is linked to a calculation base, previously defined and agreed upon in the PA, and represented by a financial indicator that reflects Novonor's short-term performance and is aligned with the ongoing goal of creating value and paying dividends to shareholders. The expected amount of ICP for each member must be agreed upon, as a function of the results planned for the area to which he/she is linked and broken down as a result of a set of individual tangible and intangible goals defined in its PA. The materialization of the ICP is subject to the variation of the calculation base, in relation to what was agreed upon, as well as the individual evaluation of the member's performance in the PA cycle.

- **Benefits:** set of programs or plans, compulsory (due to legislation or agreements) or discretionary (like pension plans) that complement the member's monthly withdrawal.
- **Premiums:** transitional application for specific situations of transfer of workplace and/or residence, in accordance with current legislation and Novonor's specific guidelines.

Additionally, at the invitation of DP-Novonor, long-term incentive plans may also be offered ("ILP"). These voluntary plans aim to tie a portion of the member's RT to long-term value creation. The ILP plans aim at the convergence of interests in the generation of long-term wealth among members in strategic programs and shareholders, as well as strengthening the long-term commitment between the two. ILP plans remunerate a period of more than 12 months and can use mechanisms such as shares, bonds, or rights representing shares, with rules of eligibility, permanence, value, term, liquidity, among other specific rules, to be determined in the respective plans.

3.3.6 CELEBRATIONS, AWARDS AND TRIBUTE

At Novonor, we encourage leaders to establish a close relationship with their subordinates. It is in the daily interaction with people and in fostering an environment of development and collaboration, that our leaders will have the sympathy and sensitivity to recognize the moments that deserve to be celebrated, strengthening the bonds of trust and mutual admiration.

We also recognize people, through awards, for their talent, spirit of service, capacity to innovate, to make knowledge available, to relate and to add value to the communities. These awards are part of institutional programs, designed and implemented at Novonor.

In addition, we have an annual tribute program, which recognizes people with long-term career paths in Novonor Group. This program reflects the admiration and respect we have for people and their ability to contribute and generate positive impacts on the company and society in general.

3.4 OUR RESPONSIBILITIES TO HEALTH, WELFARE AND SAFETY

3.4.1 HEALTH AND WELLBEING

Each member is the subject of his/her own action and chiefly responsible for the continuous care of his/her health. Health, in a broad sense and when combined with personal aspirations and lifestyle balance, generates wellbeing, greater engagement, and more productivity.

At Novonor, the health of our people is a priority issue. Our work is based on the prevention and protection of physical, mental, and social health, including the adoption of healthy habits and the transmission of knowledge and information relevant to our members for their continued wellbeing.

As an example to be followed, the leader's attitude should be proactive, educational, and motivating, creating environments conducive to the development of health and wellbeing. Through daily contact and genuine interest, the leader is able to perceive when something affects the wellbeing of his or her subordinates and is skilled at provoking dialogues that involve the topic of health, including what extends to his/her family nucleus, perceiving and respecting, with empathy, the limits set by the member. In the existence of a sensitive situation of illness, it is up to the leader to contribute so that the work environment of the subordinate is not an obstacle to overcoming the situation in question.

We are confident that wellbeing is full when health is present, which is a basic condition for the member to be able to have pleasure at work and feel productive in the other dimensions of life.

3.4.2 SAFETY

Safety is a fundamental commitment of Novonor to its employees, third parties and society in general. Safety, when incorporated as a commitment, transcends compliance with norms and standards. It is a responsibility to each other's lives and to the lives of others, both inside and outside Novonor.

Our performance is based on the prevention of accidents, diseases, environmental impacts, and any other deviation, on the awareness of exposure, on the knowledge of risks, and on the compliance and continuous improvement of procedures and guidelines, carefully elaborated, to work with the highest security standards. Our teams are staffed with safety specialists who provide support, coordinate, and promote initiatives specific to our safety system. All occupational accidents, occupational health problems and incidents can be avoided, as well as we must act to identify, mitigate and manage the potential risks of our production processes (process safety).

Our future is a consequence of the:

- Opportunities we identify;
- Choices we make;
- People we identify and develop;
- Willingness and ability to make our dreams come true.

Each of us must:

- Know and practice the safety guidelines and requirements of our work environment;
- Identify, assess, and take action to counter security risks;
- Stop any work or action that seems unsafe;
- Make sure that everyone is wearing personal protective equipment.

Find out more by referring to the Policy on Sustainability, Novonor's Policy on Risk Management.

Each of us must observe and practice the safety guidelines and requirements and promptly report deviations, incidents, accidents, unsafe acts and conditions to the immediate leader. Eventual occurrences represent a source of learning and an opportunity to review processes and/or products and implement improvements.

It is the role of each leader to ensure that the environment is conducive and complies with safety standards, and it is the responsibility of each member to know, adopt, and strictly adhere to the safety guidelines specific to his or her work environment.

3.5 OUR VISION FOR THE FUTURE

In line with the spirit of the times, Novonor is dynamic and in constant motion, toward survival, growth, and perpetuity. We identify and develop people with a vision for the future, who share the dream of making a difference, be relevant and impactful, infecting their partners and teams.

We all need a dream. But only with knowledge, determination, attitude, and action does it become reality, generating tangible and intangible results for individuals, for the company, and for society in general.

This sense of collective accomplishment generates happiness, inspiration, and work, in the service of a higher life purpose.

We are together, in continuous evolution and movement.

4 RECORDS RETENTION RULES

Not applicable to this guidance documentation.

5 SCOPE

Novonor's Personnel Policy applies to its members and managers and those of its subsidiaries that do not have a board of directors.

Additionally, this Policy serves as a guideline for the members of the boards of directors of Novonor's controlled companies appointed by Novonor, so that, in alignment with the other directors, they approve and implement a personnel policy that contains the principles, concepts and other guidelines defined and explained in this Policy, without, however, failing to promote the complements and other necessary guidance to adjust to the characteristics of their respective Businesses and to the interests of the other members.

6 AWARENESS AND CERTIFICATION PROCESS

There should be aware of this Personnel Policy within 30 (thirty) days after its approval date all members of Novonor S.A. and its subsidiaries that do not have a Corporate BoD and the Corporate PCAs to bring to their respective Corporate BoDs discussion and approval of a similar policy within their respective scope.

7 GENERAL PROVISIONS

If there is any doubt about the content of Novonor S.A.'s Personnel Policy, the member should seek clarification from his or her direct leader or, if necessary, from the person responsible for personnel support.

CONTROL INFORMATION

References: Políticas da Novonor S.A. (Conformidade com Atuação Ética, Íntegra e Transparente, Gestão de Riscos e Sustentabilidade), Sobreviver, Crescer e Perpetuar (volumes 1,2 e 3), Educação pelo Trabalho, Influenciar e Ser Influenciado (3ª edição) – Norberto Odebrecht, Suceder e Ser Sucedido – Emílio Odebrecht, artigo Visão de Futuro – Norberto Odebrecht e Princípios do Pacto Global da ONU.

Validity: This Policy is valid indefinitely, and must be revalidated at most every three years, and may be amended or revoked at any time.

Documents repealed: Amendment to Novonor S.A.'s Personnel Policy version 1

RAF Approver: Guilherme Simões de Abreu - RAF People, Communication and Organization.

Document version: 2

Version	Date	Change
1	22/11/2017	Initial Issue of the Document
2	19/03/2021	<ul style="list-style-type: none">- Structure and format adaptation according to Guideline 1- Guiding Documentation - Version 2, with inclusion of the items Index, 1. Objective, 2. Glossary, 4. Records Retention Rules, Control Information; inclusion of item 3. Provisions and adequacy of the numbering of its sub-items; adequacy of the numbering of items 5. Scope, 6. Awareness and Certification, 7. General Provisions.- General text revision to change the company name to NOVONOR and TEO to Novonor Culture;- Exclusion of references to Novonor S.A.'s guidelines